



1334 PARKVIEW AVENUE, SUITE 280 MANHATTAN BEACH, CALIFORNIA 90266
WWW.BLAKELYLAWGROUP.COM T_323-464-7400 F_323-464-7410

bblakely@blakelylawgroup.com

January 18, 2019

VIA ECF

Hon. Katherine H. Parker
United States Courthouse
500 Pearl St.
Courtroom 17D
New York, New York 10007-1312

Re: *Michael Kors, L.L.C. v. Su Yan Ye*;
Case No. 1:18-cv-02684-KHP

Dear Judge Parker,

Plaintiff Michael Kors, L.L.C. ("Plaintiff"), and Defendant Su Yan Ye ("Defendant"), by and through their counsel of record, hereby stipulate and request that the dates and deadlines set for this action by the Scheduling Order (Docket No. 44) be continued as proposed below.

This request is made on the grounds that the parties believe that a continuance of the Fact and Expert Discovery deadlines will allow them to spend their time and resources on settlement, rather than motion practice. The parties are working diligently to try to settle this matter without further assistance of the Court, and remain optimistic that they will be able to do so. To date, Plaintiff previously requested a continuance of the initial scheduling conference due to a conflict, and the Court granted same. The parties additionally made a prior request to continue the Fact and Expert Discovery deadlines, which was also granted by this Court.

Based on the foregoing, it is hereby stipulated, subject to approval by this Court, that the dates in the Scheduling Order shall be modified as follows:

[CONTINUED ON NEXT PAGE]

January 18, 2019
Page 2

Deadline Description	Current Date	Proposed Date
Fact Discovery Cut-Off	January 22, 2019,	April 12, 2019
Expert Discovery Cut-Off	March 15, 2019	June 21, 2019

Respectfully Submitted,

Counsel for the Parties:

/s/ Brent H. Blakely

Brent H. Blakely

bblakely@blakelylawgroup.com

Jessica C. Covington

jcovington@blakelylawgroup.com

BLAKELY LAW GROUP

1334 Parkview Avenue, Suite 280

Manhattan Beach, CA 90266

Telephone: (310) 546-7400

Attorneys for Plaintiff Michael Kors, L.L.C.

/s/ Eric J. Shimanoff

Eric J. Shimanoff

ejs@cjl.com

Cowan, Liebowitz & Latman, P.C.

114 West 47th Street

New York, New York 10036

Telephone: (212) 790-9200

Attorneys for Defendant Su Yan Ye